

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Case No. 5:18-cv-295-D

INVENTIV HEALTH CONSULTING, INC.,

Plaintiff,

v.

ALAN D. FRENCH, JR., PRIYA GOGIA,
JASON DEBASITIS, and JIERU ZHENG,

Defendants.

**JOINT MOTION FOR ENTRY OF
CONSENT PROTECTIVE ORDER**

Plaintiff inVentiv Health Consulting, Inc. and Defendants Alan D. French, Jr., Priya Gogia, Jason Debasitis, and Jieru Zheng, hereby jointly move that the Court enter the proposed Consent Protective Order attached hereto as Exhibit 1 as an Order of the Court, for the reasons set forth below:

1. Plaintiff and Defendants are competitors in the business of providing consulting services in the pharmaceutical industry.
2. As a consequence of discovery requests exchanged between Plaintiff and Defendants, the parties anticipate that they will disclose highly confidential, internal business records including, but not limited to, customer lists and financial records. The parties share an interest in maintaining the confidentiality of such information and limiting its use to this litigation.
3. Plaintiff and Defendants believe that entry of a confidentiality agreement as a Consent Protective Order of the Court will protect their respective interests with respect to the confidentiality of documents and testimony produced in discovery, and will aid in resolving discovery disputes.
4. All parties to this action have joined this motion.

For the above reasons, all parties to this action hereby jointly move that the Court enter the confidentiality agreement attached hereto as Exhibit 1 as an Order of the Court.

Dated this 3rd day of April, 2019.

Respectfully submitted,

INVENTIV HEALTH CONSULTING, INC.,

By its attorneys,

/s/ Stephen D. Riden

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* **Pro Hac Vice Motions to Be Filed**

ALAN D. FRENCH, JR., PRIYA GOGIA,
JASON DEBASITIS, and JIERU ZHENG,

By their attorneys,

/s/ Melanie Black Dubis

Melanie Black Dubis

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of Joint Motion for Entry of Consent Protective Order on April 3, 2019 by CM/ECF system on the following:

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/s/ Stephen D. Riden

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